

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

DEC 12 2019

David J. Bradley, Clerk
United States of America

v.

Frances Salinas De Leon
YOB: 1967 Citizenship: USC

Case No. M-19-3060-M

SAM-MJ-01562

Defendant(s)

SEALED

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 4, 2018 thru November 2018 in the county of Hidalgo in theSouthern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. §§ 1343, 1346, 1349

Offense Description

Conspiracy to commit wire fraud.

This criminal complaint is based on these facts:

See attachment.

☒ Continued on the attached sheet.

Approved by ANSA S. DIPIAZZA

SD: Piampa

A.R.A.

Complainant's signature

Arthur R. Aragon, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/12/2019 - 1:13 p.m.

[Signature]

Judge's signature

City and state: McAllen, Texas

Hon. Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

After receiving information concerning a bribery scheme related to a City of La Joya public relations contract in which a contract was awarded to Sylvia Garces-Valdez ("GARCES") in exchange for GARCES paying Frances Salinas-De Leon ("SALINAS") part of the monetary compensation GARCES was to receive via the contract, FBI Special Agents executed multiple search warrants on various e-mail accounts, including e-mail accounts belonging to Frances SALINAS and GARCES, and search warrants at the City of La Joya. During the course of the investigation, FBI Special Agents also obtained text messages between SALINAS and GARCES.

Based on a review of the e-mail and text messages (collectively referred to as "the Messages") obtained by the FBI, from about May 2018 through August 2018, SALINAS and GARCES discussed the issuance of a public relations contract from the City of La Joya. The text messages revealed statements from SALINAS, who was not employed by the City of La Joya or a city official, indicating that SALINAS was working to have a public relations contract awarded to GARCES. SALINAS indicated that she had connections with Official A, a City of La Joya official, who would ensure the approval of the contract and later amendments, if necessary. SALINAS also stated that she raised the amounts of compensation listed in initial drafts of the contract because she (SALINAS) "seriously [was] in need of a little more." SALINAS provided drafts of the contract to GARCES via e-mail and instructed GARCES to e-mail the contract to the La Joya City attorney.

The public relations contract was subsequently approved and signed by Official A and GARCES on June 12, 2018, and June 13, 2018, respectively.

The contract called for an initial payment of \$12,000 from the City of La Joya to GARCES, and an additional payment of \$2,000 monthly, in exchange for GARCES creating and maintaining a website to promote the City of La Joya. After GARCES received the initial retainer of \$12,000

via check, SALINAS provided GARCES via text messages with instructions on how to cash the check and how to divide the taxes on the income. Additionally, SALINAS also instructed, via text message, GARCES to deliver \$7,000 in cash to SALINAS.

In addition to the text messages between SALINAS and GARCES, e-mails obtained by the FBI also revealed that between May and August 2018, SALINAS and GARCES sent each other and others multiple e-mails, at least one of which traveled in interstate commerce, relating to the public relations contract.

AO 442 (Rev. 11/11) Arrest Warrant

COPY**UNITED STATES DISTRICT COURT**for the
Southern District of TexasUnited States of America
v.
Frances Salinas De Leon
YOB: 1967 Citizenship: USCCase No. **M-19-3060-M****SA 19-MJ-01562***Defendant***SEALED****ARREST WARRANT**

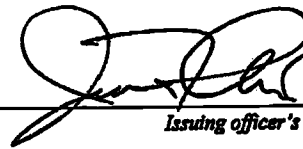
To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Frances Salinas De Leon
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. §§ 1343, 1346, 1349: Conspiracy to commit wire fraud.

Date: 12/12/2019 - 1:13 pm*Issuing officer's signature*City and state: McAllen, TexasHon. Juan F. Alanis, U.S. Magistrate Judge*Printed name and title*USMS, MCALLEN TX
12/12/19 12:12 PM 0119

Return	
This warrant was received on (date) _____, and the person was arrested on (date) _____	
at (city and state) _____	
Date: _____	_____
	<i>Arresting officer's signature</i>

	<i>Printed name and title</i>